

Michael E. Welsh (Massachusetts Bar No. 693537)
welshmi@sec.gov
Casey R. Fronk (Illinois Bar No. 6296535)
fronkc@sec.gov
Attorneys for Plaintiff
Securities and Exchange Commission
351 South West Temple, Suite 6.100
Salt Lake City, Utah 84101
Tel: (801) 524-5796

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, NORTHERN DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

DIGITAL LICENSING INC. (d/b/a “DEBT Box”), a Wyoming corporation; JASON R. ANDERSON, an individual; JACOB S. ANDERSON, an individual; SCHAD E. BRANNON, an individual; ROYDON B. NELSON, an individual; JAMES E. FRANKLIN, an individual; WESTERN OIL EXPLORATION COMPANY, INC., a Nevada corporation; RYAN BOWEN, an individual; IX GLOBAL, LLC, a Utah limited liability company; JOSEPH A. MARTINEZ, an individual; BENJAMIN F. DANIELS, an individual; MARK W. SCHULER, an individual; B & B INVESTMENT GROUP, LLC (d/b/a “CORE 1 CRYPTO”), a Utah limited liability company; TRAVIS A. FLAHERTY, an individual; ALTON O. PARKER, an individual; BW HOLDINGS, LLC (d/b/a the “FAIR PROJECT”), a Utah limited liability company; BRENDAN J. STANGIS, an individual; and MATTHEW D. FRITZSCHE, an individual;

Defendants,

Case No.: 2:23-cv-00482-RJS

**[PROPOSED] STIPULATED
TEMPORARY ORDER
REGARDING LIVING EXPENSES**

Chief Judge Robert J. Shelby

ARCHER DRILLING, LLC, a Wyoming limited liability company; BUSINESS FUNDING SOLUTIONS, LLC, a Utah limited liability company; BLOX LENDING, LLC, a Utah limited liability company; CALMFRITZ HOLDINGS, LLC, a Utah limited liability company; CALMES & CO, INC., a Utah corporation; FLAHERTY ENTERPRISES, LLC, an Arizona limited liability company; IX VENTURES FZCO, a United Arab Emirates company; PURDY OIL, LLC, a Nebraska limited liability company; THE GOLD COLLECTIVE LLC, a Utah limited liability company; and UIU HOLDINGS, LLC, a Delaware limited liability company,

Relief Defendants.

WHEREAS, on July 26, 2023, Plaintiff Securities and Exchange Commission (“SEC,” or “Commission”) filed its Complaint in this matter, alleging violations of the registration and antifraud provisions of the federal securities laws by Defendants, and the receipt of ill-gotten proceeds of such violations by Relief Defendants (Dkt. No. 1.)

WHEREAS, on July 26, 2023, the Commission filed a motion for a temporary restraining order and ancillary relief, including an asset freeze as to Defendants and Relief Defendants (Dkt. No. 3.)

WHEREAS, on July 28, 2023, the Court granted the Commission’s motion and entered a Temporary Restraining Order which, among other things, entered an asset freeze as to Defendants and Relief Defendants (Dkt. No. 9), and provided, *inter alia*, for “an allowance for necessary and reasonable living expenses to be granted only upon good cause shown by application to the Court with notice and an opportunity for the Commission to be heard,” (*id.* § IX).

WHEREAS, on August 7, 2023, and thereafter on August 17, 2023, no defendant having filed an opposition to the Temporary Restraining Order, the Court entered renewed Temporary

Restraining Orders containing the same provisions as the initial order with respect to the asset freeze. (Dkt. Nos. 33, 78.)

WHEREAS, counsel for the Commission and Defendant Ryan Bowen have reached the following agreement as to the scope of the asset freeze and an allowance for living expenses while the Temporary Restraining Order is in place, without prejudice to Defendant Ryan Bowen seeking further modification of such asset freeze or filing an opposition to the Temporary Restraining Order, and jointly provide this proposed agreement for approval by the Court:

1. The Mountain America Credit Union account ending in 2543 held in the name of P. P. B. shall be unfrozen to pay living expenses and hold going-forward, earned income unconnected to the conduct alleged in the Complaint.

2. The Mountain America Credit Union account ending in 0366 held in the name of B. M.M. shall be unfrozen to pay living expenses and hold going-forward, earned income unconnected to the conduct alleged in the Complaint.

3. The America First Credit Union account ending in 0680, held in the name of Tronic Distribution, shall be unfrozen to pay ongoing business expenses and hold going-forward, earned income unconnected to the conduct alleged in the Complaint.

4. The America First Credit Union account ending in 2667, held in the name of King B Distribution, shall be unfrozen to pay ongoing business expenses and hold going-forward, earned income unconnected to the conduct alleged in the Complaint.

5. The Hancock Whitney account ending in 1699, held in the name of Lazy Magnolia, shall be unfrozen to pay ongoing business expenses and hold going-forward, earned income unconnected to the conduct alleged in the Complaint.

6. The Hancock Whitney account ending in 6000, held in the name of Lazy Magnolia, shall be unfrozen to pay ongoing business expenses and hold going forward, earned income unconnected to the conduct alleged in the Complaint.

7. The Mountain America Credit Union account ending in 3623, held in the name of Pure Water Solutions, shall be unfrozen to pay ongoing business and living expenses and hold going-forward, earned income unconnected to the conduct alleged in the Complaint.

8. Defendant Bowen must provide to counsel to the Commission, without further request or subpoena, the monthly account statements of the accounts identified in paragraphs 3, 4, 5, 6, and 7 above, for review and inspection by no later than the 5th of each month this stipulation is in effect. These statements shall be provided to counsel to the Commission by email to Casey R. Fronk (fronkc@sec.gov) and Michael E. Welsh (welshmi@sec.gov);

9. To the extent Defendant Bowen earns additional, going-forward income that he demonstrates, to the satisfaction of counsel for the Commission, is unconnected to the conduct alleged in the Complaint, such income may be used for the payment of necessary and reasonable living expenses and payment of attorney's fees and defense costs.

Dated: August 25, 2023

**U.S. SECURITIES AND EXCHANGE
COMMISSION**

/s/ Michael E. Welsh
MICHAEL E. WELSH
CASEY R. FRONK
*Attorneys for Petitioner U.S. Securities and
Exchange Commission*

Dated: August 25, 2023

MARIA WINDHAM

/s/ Maria Windham
RAY QUINNEY & NEBEKER P.C.
Attorney for Defendant Ryan Bowen

IT IS SO ORDERED this ____ day of August 2023 at ____

ROBERT J. SHELBY
United States Chief District Judge